REMARKS

In this Amendment Applicants have amended the specification to correct typographical errors; amended claims 1, 2, 5, 10, 11, and 17; cancelled claims 3, 4 and 16; and added new claims 18-31. Claims 1, 2, 5-15, and 17-31 are currently pending in the above-captioned application. As discussed below, the amendments to the claims are fully supported by the application as originally filed. No new matter has been introduced by way of the amendments.

Claims 1, 2, 5, 10, 11, and 17 have been to amended to improve readability and to incorporate the subject matter of cancelled claims 3, 4, and 16. The amendments to claims 1, 2, 5, 10, 11, and 17 are fully supported by the application as originally filed. In particular, support for "means for generating ..." in claim 1 can be found, for example, in the specification at page 6, lines 5-7, page 9, lines 18-22, and page 11, line 26-28, support for "means for requesting ..." in claim 1 can be found, for example, on page 11, line 19 - page 13, line 14. Support for "each drill-through path containing at least one relationship, ..." in claim 2 can be found, for example, in the specification at page 6, lines 5-7, page 9, lines 18-22, page 10, lines 20-27, and page 11, line 26-28. Amended claim 2 recites applying "one or more parameters to the relationships in the selected drill-through path to produce a valid parameter mapping." Support for this amendment can be found, for example, in the specification at page 10, lines 21-27. Support for the amendment to claim 5 can be found, for example, in the specification at page 10, lines 4-5 and in the specification at page 13, line 4-5. Support for "each drill-through path containing at least one relationship, ... " in

claims 10, and 17 can be found, for example, in the specification at page 6, lines

5-7, page 9, lines 18-22, page 10, lines 20-27, and page 11, line 26-28.

New dependent claims 18 -31 have been added. Support for new claims

18, 19, 21, 22 and 2-25 can be found, for example, in the specification at page

10, lines 20-27. Support for new claims 20, 26 and 27 can be found, for

example, in the specification at page 11, line 3 - page 13, line 2. Support for new

claims 28 - 31 can be found, for example, in the specification at page 10, lines 7 -

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Objection to the Drawings

The Examiner objected to Figure 4 under 37 CFR 1.84 (p)(5) because

Figure 4 includes elements 460 and 462 not referred to in the specification.

Applicants has amended the specification at page 9, line 24 to properly identify

elements of Figure 4 by replacing "430-432" with --460-462--. Applicants

respectfully requests reconsideration and withdrawal of the objection.

Objection to the Specification

The Examiner objected to the specification because reference numbers

430-432 at page 9, line 24 are not indicated in the drawings. As discussed

above, the description at page 9, line 24 has been amended to replace "430-432"

with --460-462--. Since reference characters 460 and 462 are clearly identified in

Figure 4, Applicants respectfully requests reconsideration and withdrawal of the

objection.

Claim Objections

The Examiner objected to claim 11 because of informalities. Claim 11 has been amended to change the second instance of "(c)" in the claim to "(d)," as suggested by the Examiner in the Office Action at page 3. Applicants respectfully requests reconsideration and withdrawal of the objection to claim 11.

Claim Rejections - 35 USC §112

The Examiner rejected claims 5 and 11 under 35 U.S.C. 112, second paragraph, as being indefinite. The Examiner contends that "the filter path" recited in those claims lacks antecedent basis. Applicants has amended claims 5 and 11 to recite "...forming a filter..." thereby abrogating the Examiner's rejection.

The Examiner also asserted that the claimed "parameters (query items)" recited in claims 5 and 11 is indefinite. Although Applicants respectfully disagree, Applicants have amended claims 5 and 11 to recite "parameters", rather than "parameters (query items)." Applicants respectfully requests reconsideration and withdrawal of the rejections to claims 5 and 11 under 35 U.S.C. § 112, second paragraph.

Claim Rejections - 35 USC §102

The Examiner rejected claims 1 - 17 under 35 U.S.C. §102(e) as being anticipated by US Publication Number 2004/0034615, to Neil Thomson et al. hereinafter referred to as Thomson. Applicants respectfully traverse Examiner's rejection under 35 U.S.C. § 102(e), because Thomson fails to teach each and

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every element of the claims. Applicants also note that the Examiner's rejection is moot with respect to cancelled claims 3, 4, and 16.

In order to properly anticipate Applicants' claimed invention under 35 U.S.C. § 102, each and every element of the claim in issue must be found, either expressly described or under principles of inherency, in a single prior art reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in...the claim." See M.P.E.P. § 2131 (8th Ed., Rev. 3, Aug. 2005), quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q. 2d 1913, 1920 (Fed. Cir. 1989). Finally, "[t]he elements must be arranged as required by the claim." § 2131 (8th ed., 2005), p. 2100-76.

Independent claims 1, 2, 10, and 17, require "each drill-through path comprising at least one relationship, each relationship comprising a parameter mapping between a source and a target." Once a drill-through path is selected the data are presented to the user. By contrast, Thompson, at paragraph [0055], describes choosing from a number of (predetermined or dynamically produced) potential target reports each the result of a different drill-down ("drill-down" is synonymous with "drill-through" in Thompson). The user then chooses the target report. Therefore, Thompson, however, is entirely silent as to "each drill-through path comprising at least one relationship, each relationship comprising a parameter mapping between a source and a target", as recited in independent claims 1, 2, 10, and 17.

Claim 1 further recites "means for generating drill-through paths". As discussed above, the claimed of "drill-through paths" is neither suggested nor

taught by Thomson, thus, Thomson neither suggests nor teaches "means for generating drill-through paths" and "means for translating the request into selection of a drill-through path from a plurality of possible drill-through paths between the source and the target," as recited in claim 1 (emphasis added). Thompson also neither suggests nor teaches" translating the request into selection of a drill-through path from a plurality of possible drill-through paths between the source and the target," as recited in claims 2, 10, and 17 (emphasis added).

For at least the foregoing reasons, Applicants submit that independent claims 1, 2, 10, and 17 are not anticipated by Thomson. Dependent claims 5-15 and new dependent claims 18-31 are allowable, not only for the reasons stated above with regard to their respective allowable base claim, but also for their own additional features that distinguish them from Thomson.

For example, claim 18 recites "means for including one or more than one parameter placeholder in at least one of the relationships; and means for replacing the one or more than one parameter placeholders in the relationships by user supplied parameters to produce one or more valid drill-through paths." Thompson neither discloses nor suggests the subject matter recited in claim 18. Claim 19 recites "including, within one or more drill-through paths, relationships having one or more parameters." Thompson neither discloses nor suggests that relationships have one or more parameters, and thus fails to teach the subject matter of claim 19. Claim 20 recites "including, within one or more drill-through paths, relationships wherein at least the source is defined using meta-data

contained in a meta-data model." Thompson also fails to disclose or suggest that

at least the source is defined using meta-data. Applicants note new claims 21-23

correspond to new claim 18, and depend on claims 2, 10, and 17, respectively;

new claims 24 and 25 correspond to new claim 19, and depend on claims 10 and

17, respectively and new claims 26 and 27 correspond to new claim 20; and

depend on claims 10 and 17, respectively. Claims 21-27, therefore, are

allowable for the reasons discussed in regard to claims 18-20.

Claims 28, 30 and 31 recite "converting data during a drill-through

operation" and claim 29 recites "data conversion." Thompson neither discloses

nor suggests such conversion of data.

Hence it is respectfully submitted that claims 1-2, 5-15, and 17- 31 are

allowable in view of the cited reference. Applicants respectfully requests

reconsideration and withdrawal of the rejections. In view of the above

amendments and remarks and having dealt with all the objections raised by the

Examiner, reconsideration and allowance of the application is respectfully

requested.

If there is any fee due in connection with the filing of this Statement,

please charge the fee to our Deposit Account No. 06-0916.

Respectfully submitted,

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Dated: July 13, 2006

By:_____

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